

D/F

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

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)
INTERNATIONAL GOLD STAR TRADING) Civil Action No. 07 Civ. 856 (SJF)
CORP.,)
)
 Plaintiff,)
 vs.) **STIPULATION OF SETTLEMENT**
)
ZIP INTERNATIONAL GROUP LLC, AND)
KING OSCAR, INC.,)
)
 Defendants.)
)
----- X

Plaintiff, International Gold Star Trading Corp. ("Gold Star"), by its attorneys, Cohen, Pontani, Lieberman & Pavane, LLP, and defendant, King Oscar, Inc. ("King Oscar"), by its attorney, Robert E. Meshel, Esq., hereby agree and stipulate as to the discontinuance of the above-captioned matter as follows:

1. Gold Star hereby discontinues the above-captioned action without prejudice.
2. King Oscar agrees it will not challenge, dispute, contest, take action against, allow action to be taken against or otherwise take issue in any way with Gold Star's importation, sale or offer to sell certain cod liver products identified in paragraph 14 and Exhibit C of the Complaint. Gold Star represents that the volume of such product is one container load containing approximately 33,000 cans of cod liver.
3. Gold Star agrees it will sell off the product described in paragraph "2" above in no more than 8 months from the date the product arrives in the United States.
4. King Oscar agrees that it has no proprietary interest or protectable trademark or trade dress in a cod liver product sold in a yellow package with red Cyrillic lettering reading "ПЕЧЕНЬ" on an upwardly rising angle across the front of the package, absent more. Examples of third-party cod liver products using such packaging are attached as Exhibit A.

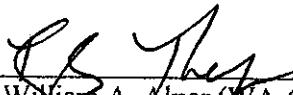
5. Gold Star agrees not to sell any cod liver product in a package that is identical to that of King Oscar as shown in Exhibit B hereto.
6. Each party shall bear its own costs and attorneys fees.
7. This Stipulation is not an admission of liability or wrongdoing by either party, and is reached solely as a business agreement to resolve the dispute between the parties hereto.
8. This Stipulation should be interpreted in accordance with the law of the state of New York, excluding its conflicts of law principles.

STIPULATED AND AGREED:

For International Gold Star Trading Corp.

COHEN, PONTANI, LIEBERMAN & PAVANE LLP

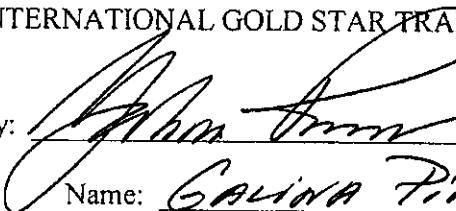
Dated: July 20, 2007

By: 

William A. Alper (WA 4780)
Roger S. Thompson (RT 2117)
551 Fifth Avenue, Suite 1210
New York, New York 10176
(212) 687-2770

INTERNATIONAL GOLD STAR TRADING CORP.

Dated: July 24, 2007

By: 

Name: Galina Pircon

Title: VP

For King Oscar, Inc.

Dated: July 17/07

ROBERT E. MESHET, ESQ.

44 Montgomery Street, Suite 1800
San Francisco, California 94104
(415) 956-4971

KING OSCAR, INC.

Dated: July 31, 2007

By:

Name: ROBERT C. MONTANO

Title: President

SO ORDERED:

Brooklyn, New York

August 21, 2007